

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERIC AHIEKPOR,

Defendant.

CASE NO. 2:20-CR-94(3)

JUDGE SARAH D. MORRISON

**RESPONSE OF THE UNITED STATES IN OPPOSITION TO
DEFENDANT'S MOTION TO TRAVEL**

The United States respectfully submits this response in opposition to Defendant Eric Ahiekpor's motion to travel. (*See* R.189.) Mr. Ahiekpor's one-paragraph motion requests permission to travel to New York, Washington, and Miami, to act as a tour manager for performing artists. The motion is filed three days before the first date he proposes to travel. It contains no details about where he would stay, why travel is necessary, or how the Pretrial Services Office would maintain effective supervision during his travel. The only supporting documentation provided is an unsigned agreement with the performing artists and what appear to be promotional materials for the concerts. Moreover, the agreement is dated 15 days before the motion was filed, and the motion contains no explanation for why this request is filed at this late hour. Defense counsel did not provide any earlier notice or additional details to the United States prior to the motion's filing. The motion is too little, too late. Mr. Ahiekpor's request for travel should be denied.

Respectfully submitted,

KENNETH L. PARKER
United States Attorney

s/ Peter K. Glenn-Applegate

PETER K. GLENN-APPLEGATE (0088708)

DAVID J. TWOMBLY (0092558)

Assistant United States Attorneys

303 Marconi Boulevard, Suite 200

Columbus, OH 43215

Phone No.: (614) 469-5715

Fax No.: (614) 469-5653

Email: peter.glenn-applegate@usdoj.gov

Email: david.twombly@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response of the United States in Opposition to Defendant's Motion to Travel was served this 25th day of February, 2022, electronically upon all counsel of record.

s/ Peter K. Glenn-Applegate

PETER K. GLENN-APPLEGATE (0088708)
Assistant United States Attorney